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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92044040
Party	Plaintiff KARIN MODELS, S.A.R.L.
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Submission	Motion to Extend
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Date	02/28/2006
Attachments	Motion to Extend Time to Respond to Discovery.pdf (3 pages)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

KARIN MODELS,
S.A.R.L.,
A Societa A Responsabilita
Limitata, Petitioner,

Cancellation Number: 92044040
Registration Numbers: 2,114,051 and 2,115,957
Mark: KARIN and KARIN MODELS (and design)
International Class: 035

vs.

JEAN LUC BRUNEL,
An Individual,
Respondent.

**PETITIONER'S MOTION FOR EXTENSION
OF TIME TO RESPOND TO DISCOVERY**

Petitioner, Karin Models, S.A.R.L., by and through its undersigned counsel hereby files this Motion to Extend the deadline to respond to Respondent's discovery requests and states as follows:

1. Petitioner's response to Respondent's Request for Production is due on February 28, 2006 and Petitioner's response to Respondent's Interrogatories is due on March 2, 2006.
2. Petitioner has been unable to gather all the information being requested by Respondent and hereby requests an additional two (2) weeks to respond to the Request for Production and two (2) weeks and two (2) days to respond to the Interrogatories.
3. Petitioner has tried to contact Respondent's counsel to seek consent to the extension, but has not heard back. A copy of the e-mail request is attached as Exhibit "A."
4. This motion is made in good faith and not for the purposes of delay.

WHEREFORE, Petitioner, respectfully requests that an extension of the deadline to respond to Respondent's requests be granted up and until March 16, 2006.

Dated: February 28, 2006

Respectfully submitted,

Feldman Gale, P.A.

By: /ews/ Erica W. Stump

Steven E. Eisenberg/ FL Bar No.: 441112

Erica W. Stump/ FL Bar No.: 427632

Attorneys for Petitioner

Attorneys for KARIN MODELS, S.A.R.L

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Facsimile (305) 358-3309

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this document was served by U.S. Regular Mail, postage prepaid, to Respondent's counsel, on this 28th day of February, at the following address:

Kozlowski Law Firm, P.A.
Steven Robert Kozlowski, Esq.
The Sterling Building.
927 Lincoln Road, Suite 118
Miami Beach, Florida 33139

/ews/Erica W. Stump

Erica W. Stump

Maribel Elias

From: Erica Stump
Sent: Sunday, February 26, 2006 5:18 PM
To: Steven R. Kozlowoski (E-mail)
Cc: Steven E. Eisenberg; Maribel Elias
Subject: KARIN discovery responses

Steven:

Could I get an additional two week extension to respond to the outstanding discovery (the responses to the Request for Production are currently due on 2/28 and the responses to the interrogatories are currently due 3/2)?

Thanks.

Erica W. Stump, Esq.
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